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BY ECF

Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Prince v. The Intercept, et al.*, Case No. 21 Civ. 10075 (LAP)

Dear Judge Preska:

We represent Plaintiff Erik Prince, and write to respectfully request leave to file a consolidated opposition brief to all Defendants' motions to dismiss of not more than 35 pages.

As the Court will recall, three of the defendants in this case filed two separate motions to dismiss, approximately two weeks apart. [ECF Nos. 15–17, 21–24]. The Court previously granted Plaintiff an extension of time to respond to the first-filed motion so that he could submit a single consolidated opposition, which is now due on Monday, March 21, 2022. [ECF No. 20]. Having now received and reviewed both motions, Plaintiff respectfully requests leave to file a consolidated opposition of no more than 35 pages so as to have space to adequately respond to all of Defendants' arguments (which collectively spanned about 33 pages).

Defendants do not oppose this request, but have asked us to note that they reserve their right to file separate replies in support of their motions, if they choose.

Thank you for your consideration of this request.

Respectfully,

/s/ Matthew L. Schwartz
Matthew L. Schwartz